

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM BRANCH

Vs.

Mr. RUSSIAN, et. al.,

: CIVIL ACTION No. 1:00-CV-1728  
; (Judge SONNER)  
:

FILED  
HARRISBURG  
MAY 12 2004  
MARY K. FRANKLIN, CLERK  
DEPUTY CLERK

LIST OF WITNESS AND WHAT THEY WILL BE STATING

1. MR KEVIN BLOW                      MR BLOW WILL TESTIFY OF THE TREATMENT THAT  
    3218 N.17th ST.                      I RECIVED UNDER CO. RUSSIAN AS HE WAS INMATE  
    PHILA. PA.19123                      HOUSED ON THE SAME BLOCK AS MYSELF DURING  
   SAID TIME AND CAN STATE THE ROUTINE EMPLOYED  
   BY THE STAFF AT SCI WAYMART WHEN A STAFF MEM-  
   -BER IS REPORTED FOR A MISCONDUCT BY A INMATE  
2. DECON BIAGI                      DECON BIAGI WILL STATE THAT ON MANY OCCAISONS  
    P.O. BOX 256                      HE HAS SPOKEN WITH THE STAFF ON MY BEHALF AND  
    WAYMART, PA.18472                      WHAT THEY TOLD HIM, AND WHAT HIS UNDERSTANDING  
   AS MY RELIGIOUS ADVISER WAS TO THESE ISSUES.
3. all defendants                      they will testify as to their sworn declaration  
   and the contradictions based on the D.O.C. Policy.  
   AND THEIR VIOLATIONS OF MY CONSTITUTIONAL RIGHTS.
4. M-2 and F-2                      Records and Decon Biagi records of his performance at  
    S.C.I. Waymart                      I SUBPOENA DUCES TECUM I request that decon Glen  
    Biagi compile                      a. the green tablets that the co's use to record what  
    has happen on the block with regard to a inmate from sept. 2000 ON F-2  
    to January 2004 along with the green tablets on M-2 from January  
    1994 to July 2000 and from January 2004 include my quota cards  
    FOR THE ENTIRE TIME I HAVE BEEN AT S.C.I. WAYMART UNTILE NOW  
    WITH REGARD TO GREEN TABLES ON M-2
5. I WOULD ALSO REQUEST THAT THE STAFF AT S.C.I. WAYMART PREPARE AND  
    PROVIDE DECON GLEN BIAGI WITH THE FOLLOWING DATA
  - a) A LIST OF ALL INMATES PAROLED WHO DID NOT COMPLETE THE SEX  
    OFFENDERS PROGRAM HERE AT WAYMART FROM 1994 TO 2004
  - b) HOW MANY OF THESE WERE WHITE AND HOW MANY WERE BLACK
  - c) HOW MANY OF THESE REOFFENDED WITH THE SAME CRIME
  - d) A LIST OF ALL INMATES PAROLED WHO DID COMPLETE THE SEX OFFENDERS  
    PROGRAM (AND ANSWERS TO QUESTIONS a THRU c ON THIS QUESTION)

Page 2

Wm.BRANCH Vs.RUSSIAN et. al., CV-No.1-cv-1728

WITNESS LIST AND WHAT THEY WILL BE STATING

6. D. MASON CD-8108 PAROLE WILL STATE THAT Ms.SUCHY LIED IN HER MISCONDUCT STATING THAT I TOLD MR. MASON SHE TOLD HIM TO TAKE OUT THE TRASH AND THAT WE HAD BEEN TOLD BY MR. PULMINSKI TO COMMUNICATE WITH EACH OTHER TOO BETTER GET THE WORK DONE AND NO AREA WAS NOT COVERED.
7. CHARLES DAVIS DW-8054 PAROLE WILL STATE THAT C/O KARAWSKI DID CALL ME A ASSHOLE " COME UP HERE ASSHOLE" ON 7-14-01 DURNING 1630 count GREIVANCE # WAM-149-01
8. I REQUEST THAT DOCUMENT REQUEST TO STAFF MEMBER BY WILLIAM BRANCH TO SUPT. COLLERAN LISTED ON DOCKER SHEET BE HANDED OVER TO THE F.B.I. FOR FINGER PRINTING AND A EXPERT TO APPEAR IN COURT TO STATE WHO BALL UP THE REQUEST USING LT.WELLINGTON FINGER PRINTS AS I HAVE STATED THAT HE DID BALL THIS REQUEST UP AND THROUGH IT IN MY CELL AND THREATEN ME NOT TO REPORT HIM OR HIS STAFF AGAIN OR HE WOULD STOP BEENING NICE.

CERTIFICATE OF SERVICE

S.D.A.G. MS. MOSLEY Esq. 15 Fl. STRAWBERRY SQ. HARRISBRUG PA.17120

UNSWORN DECLARATION

I AFFIRM UNDER PENALTY OF THE LAW THAT THE ABOVE IS TRUE

DATE 4-28-04

William Branch CF3756  
PO BOX 256  
WAYMART PA.18472